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March 7, 2016

The Honorable Gregory M. Sleet
United States District Court
for the District of Delaware
844 North King Street
Wilmington, DE 19801

VIA ELECTRONIC FILING

Re: *Tris Pharma, Inc. v. Actavis Laboratories FL, Inc.*
C.A. No. 14-1309 (GMS) (Consolidated)

Dear Judge Sleet:

As directed, the parties jointly submit this letter to identify disputes concerning the proposed protective order to be addressed at the teleconference scheduled for March 9, 2016, at 11:00 a.m.:

Issue 1: Whether the parties' in-house personnel should have access to the other parties' confidential information (whether the protective order has one or two tiers of confidentiality). (Paragraphs 1(a), 4(a)-(e)). If a two tier protective order:

- What types of information in-house personnel may access ("Confidential" designation) and what types of information may be designated "Outside Counsel Eyes Only." (Paragraphs 4(a)-(c)); and
- How many in-house personnel have access (Paragraph 4(d)(2) and footnote 3).

Issue 2: The scope of the FDA bar (Paragraph 3(c)) and its impact on the scope of information designated "Outside Counsel Eyes Only."

The parties, with the permission of the Court, attach the relevant excerpts of the protective order. (*See* Exhibit A.) The parties appreciate the Court's time with regard to this matter.

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Respectfully,

/s/ Derek J. Fahnestock

Derek J. Fahnestock (#4705)

DJF/dla

Enclosure

cc: Clerk of Court (via hand delivery; w/enclosure)
All Counsel of Record (via electronic mail; w/enclosure)